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LABELING INSECTICIDES CONTAINING DDT

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The term "DDT" refers to the technical grade of 2,2-bis (parachlorophenyl) 1,1,1-trichloroethane, which contains as impurities considerable amounts of isomers and much smaller amounts of other by-products formed in its manufacture. So far as we are now aware, the normal impurities in DDT are active ingredients within the meaning of the Insecticide Act of 1910. Therefore, its label is not required to bear an ingredient statement.

When DDT is applied as an insecticide, it is mixed or compounded with other materials to make it suitable for application. If all of the ingredients are active, no ingredient statement is required to appear on the label, but if any of the added ingredients are inert - that is, if any of them are not in themselves insecticides for the purposes intended - the label is required to bear the name and percentage amount of each and every inert ingredient or, in lieu of this, the name and percentage amount of each and every active ingredient, together with the total percentage of the inert ingredients. The ingredient statement is required in the case of shipments of insecticides intended for experimental use, as well as those made for commercial use.

There is at the present time no practical method of determining all of the different compounds in DDT. In view of this, no objection is raised to considering dichloro diphenyl trichloroethane (which includes 2,2-bis (parachlorophenyl) 1,1,1-trichloroethane and its isomers) as the active ingredient. For a preparation containing DDT as its only active constituent, the following form of ingredient statement, which should appear prominently on the front panel of the label, will be acceptable:

ACTIVE INGREDIENT	
Dichloro diphenyl trichloroethane	____%
INERT INGREDIENTS	____%
Total	100%

the correct values to be inserted in the blank spaces. If other active ingredients are present, the ingredient statement should be changed to show their names and percentages.

The amount of DDT which has been available for experimental work in agricultural and civilian fields has been limited and even now it is restricted to experimental use. The Bureau of Entomology and Plant

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Quarantine and entomologists have not issued recommendations for commercial use; therefore, we are not in position to indicate any directions for use which would be acceptable under the provisions of the Insecticide Act. There is no provision in the act which prohibits the appearance on the label of recommendations for use which are not false or misleading but none should be made unless based on the results of adequate tests to determine not only its efficacy but also the harmful effects, if any, that it may have when used as directed.

The Insecticide Act does not require poison labeling but since the use of DDT involves certain hazards, products containing it must not be labeled so as to state or imply that they are safe or nonpoisonous. Furthermore, it is desirable that the labels of insecticides containing DDT bear a caution to avoid personal injury. Such caution should provide for avoiding skin contact, avoiding inhalation of the dust or spray, and keeping the material from all contact with foods. The caution statement should be set out prominently so that it will come to the immediate attention of the user.

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